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October 17, 2006

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Notice of Ex Parte Presentation – WC Docket Nos. 06-159, 01-92*

Dear Ms. Dortch:

This letter is to notify you that on behalf of Verizon Wireless, I met yesterday with Michelle Carey, Senior Legal Advisor to Chairman Kevin Martin, to discuss Neutral Tandem's Petition for Interconnection and its Motion for Interim Order filed in this docket. In the meeting, we discussed the relationship of the Petition to the pending inter-carrier compensation docket.

As evidenced by AT&T's reply comments filed in WC Docket No. 06-159, the Petition squarely raises many of the same issues that are before the Commission in the Missoula Plan. AT&T, however, mischaracterizes Neutral Tandem's Petition and misstates the law. It is not the case that consideration of Neutral Tandem's Petition "must begin" with Section 251(a)(1).¹ Neutral Tandem's Petition did not invoke any purported rights under § 251(a)(1), and Neutral Tandem itself recognizes that "[s]ection 251 is *irrelevant* here."² Instead, Neutral Tandem's Petition was limited to claims under Sections 201 and 332(c)(1)(B). Verizon Wireless has demonstrated that those claims are erroneous.

In addition to AT&T's reply comments, we discussed Neutral Tandem's claims about network reliability and disaster preparedness. To the extent that parties share transport paths that are impacted by a disaster, all parties are affected. Diversity of parties connecting to Verizon Wireless accomplishes no increase in reliability where the

¹ AT&T Reply Comments, WC Docket No. 06-159, at 1 (Sept. 25, 2006).

² Neutral Tandem Reply Comments, WC Docket No. 06-159, at 19 (Sept. 25, 2006) (emphasis added).

Ms. Dortch
Page 2
October 16, 2006

entity to which Verizon Wireless's cell sites and trunking are connected goes down. Verizon Wireless's reply comments (at 11-13) refute claims of increased reliability. Moreover, Neutral Tandem's diagram attached to its reply comments incorrectly describes the nature of Verizon Wireless's connections in New York. In fact, Verizon Wireless has tens of thousands of trunks to Verizon end offices that bypass Verizon's tandems entirely and tens of thousands of direct trunks that also bypass Verizon's tandems.

Consistent with the Commission's rules on *ex parte* communications, this letter is being filed electronically in the captioned docket. Please let me know if there are any questions related to this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charon Phillips". The signature is fluid and cursive, with the first name "Charon" being more prominent than the last name "Phillips".

Charon Phillips

cc: M. Carey